

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**MARIA MOE,**

**Plaintiff,**

**Civil Action No. 25-10195-GAO**

**v.**

DONALD TRUMP, in his official capacity as  
President of the United States; JAMES R.  
MCHENRY III, in his official capacity as Acting  
Attorney General of the United States; WILLIAM  
LOTHROP, in his official capacity as Acting  
Director of the Federal Bureau of Prisons;

**Defendants.**

**DECLARATION OF RICK STOVER,  
SENIOR DEPUTY ASSISTANT DIRECTOR  
DESIGNATION AND SENTENCE COMPUTATION CENTER**

I, Rick Stover, declare and state as follows:

1. I am currently employed by the Federal Bureau of Prisons (Bureau). Since June 2024, I have served as the Senior Deputy Assistant Director of the Designation and Sentence Computation Center, within the Bureau's Correctional Programs Division.

2. Prior to becoming Senior Deputy Assistant Director of the Designation and Sentence Computation Center, I worked in positions of increasing responsibility within the Bureau, most recently as the Warden at the Federal Correctional Institution in Danbury, Connecticut.

3. I am familiar with the Bureau's general policies and practices on housing for transgender inmates, including the rationales for those policies. As part of my official duties, I have access to records maintained in the ordinary course of business by the Bureau, including inmate medical and mental health records.

4. As the Senior Deputy Assistant Director within the Bureau's Correctional Programs Division, I am a member of the Transgender Executive Council (TEC). I am responsible for monitoring and providing guidance on transgender issues. I manage monthly or twice monthly Transgender Executive Council (TEC) multi-disciplinary team meetings and review all initial designations and re-designation requests of inmates self-identifying as transgender in the Bureau. I am involved in the development of accommodations, resource information, programs, and policy to ensure the needs of transgender inmates are met.

5. The information below is based upon personal knowledge and upon information and belief.

6. As of January 10, 2025, there are 2,230 transgender inmates housed in BOP facilities and halfway houses. There are 1,506 Male to Female Transgender inmates and 724 Female to Male Transgender inmates. The BOP currently has 16 Male to Female transgender inmates living in female institutions.

7. Plaintiff, Maria Moe, Register Number \*\*\*\*\*-\*\*\*, is currently housed at the Federal Correctional Institution in [REDACTED]. Plaintiff is a transgender prisoner that has been receiving treatment for Gender Dysphoria since [REDACTED].

8. Maria Moe was removed from the Special Housing Unit and placed back into general population on January 27, 2025.

9. The Transgender Executive Council convened on January 24, 2025, and reviewed Moe's progress and current housing placement. The council found that the institutions that were most appropriate for Moe were the [REDACTED]

[REDACTED] and [REDACTED]

The

council reviewed [REDACTED]

10. In determining the most appropriate placement, the council took into account the

11. The council found that [REDACTED] were primary options


because each is [REDACTED]

Based on the council's experience and range of expertise, placing Moe at [REDACTED]

[REDACTED] would minimize the likelihood that Moe would be victimized.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: January 28, 2025

  
RICK STOVER